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Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO;
WILLIAM HUGHEN; KEVIN BIRMINGHAM; NATALIA FOSSI
(ERRONEOUSLY SUED AS NATALIA KWAITKOWSKA);
MAURICIO HERNANDEZ; and JOE DUFFY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICK GALLAGHER,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, BERNARD CURRAN,
RODRIGO SANTOS, WILLIAM HUGHEN,
KEVIN BIRMINGHAM, NATALIA
KWAITKOWSKA, AND JOE DUFFY,

Defendant.

Case No. 23-cv-03579-SI (JCS)

**DECLARATION OF HUNTER W. SIMS IN
SUPPORT OF DEFENDANTS' REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

Hearing Date: January 16, 2026

Time: 10:00 a.m.

Place: Videoconference

Trial Date: February 17, 2026

DECLARATION OF HUNTER W. SIMS III

I, Hunter W. Sims III, declare as follows:

1. I am a Deputy City Attorney in the Office of the City Attorney for the City and County of San Francisco. I am the Deputy City Attorney assigned to the above-captioned matter. I have personal knowledge of the contents of this declaration, except where indicated otherwise, and I could and would testify competently thereto if called upon to do so.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Initial Disclosures.

3. Attached as Exhibit B is a true and correct copy of relevant portions of Defendants' Requests for Production of Documents served on Plaintiff Patrick Gallagher.

4. I have reviewed Plaintiff's opposition to Defendants' Motion for Summary Judgment where he seeks to introduce a recording of a meeting between himself, Ernest Jones, an aide to former San Francisco Supervisor Ahsha Safai, and other City officials.

5. Plaintiff did not provide any audio files in response to these requests, nor did he provide a transcript of any such recordings. Specifically, Plaintiff did not produce what he seeks to introduce into the record as Exhibit C to his declaration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of December 2025, at San Francisco, California.

/s/ Hunter W. Sims III
HUNTER W. SIMS III